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PROPOSED ATTORNEYS FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

IN RE: §  
§ CASE NO. 23-42712-MXM-11  
METROPLEX RECOVERY, LLC §  
§ Chapter 11  
Debtor. §

**DEBTOR'S EMERGENCY MOTION FOR USE OF CASH COLLATERAL**

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW Metroplex Recovery, LLC, the Chapter 11 Debtor in the above styled and referenced bankruptcy case (hereinafter the Debtor), and files this its Emergency Motion for Use of Cash Collateral pursuant to 11 U.S.C. § 363 of the Bankruptcy Code and in support of same would respectfully show the following:

1. On September 7, 2023, the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code. The Debtor is now operating its business and managing its property as a debtor in possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code. No request has been made for the appointment of a trustee or examiner and no official committee has yet been appointed.

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of the Chapter 11 case and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. Debtor requests the Court to enter an Interim Order for Use of Cash Collateral in the form attached hereto as Exhibit A.

4. Debtor has an immediate need to use the cash collateral of US Dept of Treasury SBA, Legend Advanced Funding II, LLC, National Funding, Wide Merchant Capital (the Secured Lenders), the Debtor's secured creditors which may be claiming liens on Debtors personal property including cash and accounts. The Debtor can adequately protect the interests of the Secured Lenders as set forth in the proposed Interim Order for Use of Cash Collateral by providing the Secured Lender with post-petition liens, a priority claim in the Chapter 11 bankruptcy case, and cash flow payments as necessary to protect the interests of each such lender. The cash collateral will be used to continue the Debtor's ongoing operations. The Debtor is a mobile locksmith offering assistance to motorists who are locked out of their vehicles. The Budget attached to the proposed Order permits the payment of ongoing operating expenses of the Debtor in order to allow the Debtor to maintain its operations in Chapter 11. The Debtor intends to rearrange its affairs and needs to continue to operate in order to pay its ongoing expenses, generate additional income and to propose a plan in this case. The Debtor's proposed One-Month Budget is attached hereto as Exhibit B.

5. This is an emergency matter since the Debtor has no outside sources of funding available to it and must rely on the use of cash collateral to continue its operations.

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully requests that this Court enter an Interim Order for Use of Cash Collateral in the form attached hereto as Exhibit A and for such other and further relief to which the Debtor may be justly entitled.

Dated: September 11, 2023

Respectfully submitted,

/s/ Jim Morrison

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the parties listed on the attached mailing matrix by Electronic Mail via the Clerks ECF system or by United States first class mail, postage prepaid on September 11, 2023:

Legend Advance Funding II LLC  
10 W 37th St Rm 602  
800 Brickell Ave 902  
Miami, FL 33131

National Funding  
9530 Towne Centre Dr  
San Diego, CA 92121

US Dept of Treasury SBA  
P.O. Box 97901  
Saint Louis, MO 63197

U.S. Small Business Administration  
Office of Disaster Assistance  
14925 Kingsport Rd.  
Fort Worth, TX 76155

Wide Merchant Capital  
300 Delaware Ave 210  
Wilmington, DE 19801

United States Trustee  
Office of the U.S. Trustee  
1100 Commerce, Room 976  
Dallas, Texas 75242-1496  
Email: ustpregion06.da.ecf@usdoj.gov

/s/ Jim Morrison  
Jim Morrison